

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

LOCAL 705 INTERNATIONAL BROTHER-)	
HOOD OF TEAMSTERS PENSION FUND,)	
<i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 07 C 1905
vs.)	
)	JUDGE CHARLES R. NORGLER
P & K EXPRESS CO., INC., a dissolved corpora-)	
tion and PATRICK A. PITELLO, individually)	
and d/b/a P & K EXPRESS CO., INC.,)	
)	
Defendants.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendants, P & K EXPRESS CO., INC., a dissolved corporation and PATRICK A. PITELLO, individually, and d/b/a P & K EXPRESS CO., INC., in the total amount of \$22,216.15, with interest accruing at the rate of \$1.45 per day up to and including the date the contributions are paid to the Pension Fund and interest accruing at the rate of \$1.44 per day up to and including the date the contributions are paid to the Welfare Fund, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$2,386.25.

On April 29, 2007, the Summons and Complaint was served on the Registered Agent for Defendant P & K Express Co., Inc., a dissolved corporation, by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). In addition, the Summons and Complaint was personally served on Defendant Patrick A. Pitello, individually and d/b/a P & K Express Co., Inc., by tendering a copy of said

documents to him personally at his residence. Therefore, Defendants' answers were due on May 21, 2007. As Defendants have failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Patrick N. Ryan

Patrick N. Ryan
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 7th day of June 2007:

Patrick A. Pitello, Registered Agent
P & K Express Co., Inc.
1233 Honey Hill Road
Addison, IL 60101-1123

Mr. Patrick A. Pitello
1233 Honey Hill Road
Addison, IL 60101-1123

/s/ Patrick N. Ryan _____

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